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WITNESS I			Beth Tho July 23, 2	mpson - Cabell County 30(b)(6) 020 and July 28, 2020													
Page/Line	Begin	Page/Lir	ne End	DFENDANT AFFIRMATIVE DE	EPOSITION DESIGNATIONS Replies to Objections	Page/Line I	Begin	Page/Line	End .	PLAINTIFF COUNTER DESIGNATIONS *Pink = Co Objections	mpleteness Designation Replies to Objections	Page	/Line	Page	e/Line End	DEFENDANT REPLY DESIGNATIONS *Pink = 0 Objections	Completeness Designation Replies to Objections
4 4		4	11	n/a		16	3	16	17	n/a		Begin 22	13	22	24	No objection contingent upon Plaintiffs'	Completeness reply to improper completeness designation.
5 13		5	15	n/a		19	7	19	9	n/a		24	18	25	3	completeness designation being admitted No objection contingent upon Plaintiffs'	Completeness reply to improper completeness designation.
5 24		6	7	n/a		19	19	19	23	n/a		48	22	49	5	completeness designation being admitted Speculation; Calls for Legal Conclusion	
6 24		7	10	n/a		20	7	20	16	n/a		73	16	73	22	n/a	
20 17		21	4	na		21	5	21	16	cannot introduce into evidence out of court statements by the Commission (these statements are, of course, not "statements of a party opponent" under 80 (q/Q2) when the County itself attempts to introduce them).	This designation completes and/or provides contract to Defendant's designation regarding when the Courty Commission became aware of the opioid problem and the designated answer regarding when Distributed Defendants dumped pills into Cabel Courty. See Dep. at 201-172-14. Pursuant to FRE 108, "If if a party introduces all or part of a writing or recorded statement," an adverse party may require the introduction, at that time, of any other part that in fairness ought to be considered at the amen time. A distribution, the telestimory is not hearray, and even if somehow found to be so, it would still be admissible for purposes of completeness. See "Lufted States v. Gravely. 360 F.2 di 156, 1163 (Aft Cir. 1988) (The cross-designated portions, white penhaps not admissible as a remainder of a recorded statement.).	98 t	4	98	18	No objection contingent upon Plaintiffs' completeness designation being admitted	Completeness reply to improper completeness designation.
25 23		26	20	n/a		22	8	22	12	Improper compeleteness designation - It isn't responding directly to anything Defendants designated, and FRCP 32(a)(3) only permits an adverse party to use a 30(b)(6) deposition for any purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these statements are, of course, not 'statements of a party opponent' under 801(d)(2) when the County isself statements is notingfusc plants.	Same response as above.	130	6	130	9	Relevance (as this amount and/or quantification has been addressed by Plaintiffs' experts)	Completeness reply to improper completeness designation.
27 21		28	3	n/a		23	23	24	17	Itaal'i atamete to introduce them). Improper completeness designation - it isn't responding directly to anything Defendant's designated, and FRCP 32(a) only permits an adverse party to use a 30(b)(b) deposition for any purpose. As a result, this is heartesy - the County at statements by the Commission (these statements by the Commission (these statements are, of course, not 'statements of a party opponent' under 801(d)(2) when the County itself attended to introduce them.	Same response as above.	139	21	140	2	Speculation	
29 23		30	2	Relevance	This is clearly relevant testimony. Cabell County (along with Huntington) are seeking more than \$2 billion it shales" the opioid-eigheim, cliaining that such money is "necessary." Cabell County identified theft or prescription opioids as a leading contributor to the epidemic. The fact that the Cabell County Commission has never communicated with law enforcement about this issue shows that the County has not used the resources already alt its disposal to address this issue.	26	21	27	20	n/a	n/a	183	24	184	3	n/a	
30 12		30	15	n/a		28	4	29	2	n/a	n/a	336	21	336	24	Relevance (as this amount and/or quantification has been addressed by Plaintiffs' experts)	1
31 22		32	19	n/a		30	16	30	24	Improper completeness designation - it isn't responding directly to anything Defendants designated, and RFCP 32(a)(a) or yermits an adverse party to use a 30(b)(6) deposition for any purpose. An a result, this is hearsey—the County cannot introduce into evidence out of court statements by the Commission (these statements are, of course, not "statements of a party copponer" under 301(a)(2) when the County itself attempts to introduce them).	This designation completes, explains, and/or provides context to the lestimony designated by Defendants regarding what the County Commission has done to address the opicial problem. See Dept. at 30:12 15. Pursuant to FRE 106, Till a party introduces all or part of a writing or recorded statement, an adverse party may require the introduction, at that time, of any other part That in fairness ought is to be considered at the same time. Additionally, the testimony is not hearsay, and even if somehow found to be so, it would stilb a entirelish for purposes of completeness. See "Lettled States vs. Gravely. 304 P.2 of 1156, 1163 (4th Cr. 1588) (The cross-designated protrons, white perhaps not admissable and entirelished and controlled the controlled of standing doke, or endinessible as a remainder of a recorded statement.)	393 t-	23	394	9	No objection contingent upon Plaintiffs' completeness designation being admitted	Completeness reply to improper completeness designation.
33 3 3 12		33 34	18 22	n/a n/a		33 38	19	34 38	5 24	purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these statements are of course not "statements of a	Into This designation completes, explains and/or provides context to the teatmony designated by Defendants regarding the County Commission passing ordinance, problems with enforcement of same, and/or why an analysing continuous problems with enforcement of same, and/or why an 483-8442, 463-13. Pursuant to FRE 109, "Ill' a partly introduces all or and of a writing or recorded statement, an adverse partly may require the introduction, at that time, of any other part That in fairness coght to be considered at the same time." Additionally, the testimony is not hearins, and even if something the same time? Additionally, the testimony is not hearins, and even if something the same time? Additionally, the testimony of Tothe considered at the same time? Additionally, with Explaint 163 (The cross-designated portions, white perhaps not admissible standing abone, are admissible to a remainder of recorded statement.")						
35 5 40 3		35 41	23 5	n/a Relevance	This is clearly relevant testimony. Cabell County (along with Huntington)	46	16	48	21	n/a n/a	n/a n/a		1		1		
					are seeking more than \$2 billion to "abate" the opioid epidemic, claiming after such more; is "necessary." The fact that local treatment facilities are not at all funded by Cabell County shows that the County is not the proper entity to receive any money for "treatment." The County is not in the business of providing treatment services.												
42 3		42	13	Relevance	This is clearly relevant testimony. Cabell County (along with Huntington) are seeking more than 52 billion to "abable" the piolid epidemic, claiming that such money is "necessary." The fact that the Commission has the power to enact an ordinace to address the opioid epidemic yet has chosen never to exercise that power undermines the County's claims that it now requires more than \$2 billion.	49	6	49	16	n/a	n/a						
43 8		44	24	Relevance	This is clearly relevant testimony. Cabell County (along with Huntington) are seeking more than \$2 billion to "abate" the opioid epidemic, claiming that such money is "necessary." The fact that the Commission has the power to enact an ordinace to address the opioid epidemic yet has chosen never to exercise that power undermines the County's claims that it now requires more than \$2 billion.	56	18	56	23	n/a	nia						
45 3		46	15	Relevance; Argumentative	There is nothing remotely argumentative in this scorpt and Plaintiffs have not identified any argumentative question. Like the above, this is clearly relevant testimory. Counsel asked the witness whether the County had	57	14	57	19	purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these	This designation completes, explains and/or provides context to the testimony designated by Defendants regarding sources of point issues in Cabell County. See e.g., Dep. at 34:12-22, 65:1-685. Pursuant to FRE 106. [1/g aparty introduces all or part of a writing or recorded statement, an adverse party may require the introduction, at that time, of any other part that in feiness ought to be considered at the same time.* Additionally, the testimony is not hearsay, and even if somehow found to be o, it would still be admissible for purposes of completeness. See Gravely, 340 F.2d at 1163 ("The cross-designated portions, while perhaps not admissible standing alone, are admissible as a remainder of a recorded statement.").	1					

AEPOLIN-160078514 v1

Case 3:17-cv-01362 Document 1501-14 Filed 10/04/21 Page 3 of 7 PageID #: 67978

	ESS NAME: SITION DAT	E:		pson - Cabell County 30(b)(6) 20 and July 28, 2020									
40	147	Iao	104	DFENDANT AFFIRMATIVE DE	This is clearly relevant testimony. Cabell County (along with Huntington)	F0	la .	leo.	Inn	PLAINTIFF COUNTER DESIGNATIONS *Pink = Comple	eteness Designation	 DEFENDANT REPLY DESIGNATIONS *Pink = Com	pleteness Designation
45	"	40	21	Itelevance	are seeking more than \$2 billion to "abate" the opioid epidemic, claiming	30	"	35	20	liva liva			
					that such money is "necessary." The fact that the Commission has the								
					power to to take certain actions to address the epidemic yet has chosen								
					never to exercise that power undermines the County's claims that it now requires more than \$2 billion.								
51	14	52	2	Vague	The questions are not vague and the witness did not express any difficulty	60	17	60	24	n/a n/a			
					in answering the questions or express any confusion. The 30b6 witness is itself the representative of the Cabell County								
60	3	60	16	Calls for Expert Opinion; Calls for a Legal Conclusion; Speculation	The 30b6 witness is itself the representative of the Cabell County Commission. It is not "speculative" to ask the Cabell County Commission	63	13	63	16	n/a n/a			
				Legal Conclusion; Speculation	whether the Commission was aware of any causes of the opioid								
					epidemic. It is also not seeking a legal or expert opinion: prior to retaining								
					any expert witnesses in this case, Cabell County publicly filed a								
					Complaint against Distributors alleging that Distributors were a cause of								
					the opioid epidemic. Defendants are entitled to probe the Commission's								
					designee to ask about other alleged causes that the Commission was								
65	1	66	6	Calls for Expert Opinion; Calls for a	The 30b6 witness is itself the representative of the Cabell County	66	19	67	13	n/a n/a			
				Legal Conclusion; Speculation	Commission. It is not "speculative" to ask the Cabell County Commission								
					whether the Commission was aware of any causes of the opioid epidemic. It is also not seeking a legal or expert opinion: prior to retaining								
					any expert witnesses in this case, Cabell County publicly filed a								
					Complaint against Distributors alleging that Distributors were a cause of								
					the opioid epidemic. Defendants are entitled to probe the Commission's								
		1			designee to ask about other alleged causes that the Commission was								
83	6	83	14	Speculation; Calls for a Legal	The 30b6 witness is itself the representative of the Cabell County	68	20	68	24	Improper completeness designation - it isn't Plain	ntiffs will withdraw designation.		
		1		Conclusion; Calls for Expert Opinion	Commission. It is not "speculative" to ask the Cabell County Commission					responding directly to anything Defendants			
		1			whether the Commission was aware of any causes of the opioid					designated, and FRCP 32(a)(3) only permits an adverse party to use a 30(b)(6) deposition for any			
	1	1			epidemic. It is also not seeking a legal or expert opinion: prior to retaining any expert witnesses in this case, Cabell County publicly filed a					purpose. As a result, this is hearsay - the County			
	1	1			Complaint against Distributors alleging that Distributors were a cause of					cannot introduce into evidence out of court			
		1			the opioid epidemic. Defendants are entitled to probe the Commission's					statements by the Commission (these			
	1	1			designee to ask about other alleged causes that the Commission was					statements are, of course, not "statements of a			
L					aware of.					party opponent" under 801(d)(2) when the County itself attempts to introduce them)			
85	22	86	6	n/a		69	22	70	12	Improper completeness designation - it isn't This	designation completes, explains and/or provides context to the		
										responding directly to anything Defendants testing	mony designated by Defendants regarding marketing of opioids in		
											ell County. See Dep. at 65:1-6. Pursuant to FRE 106, "[i]f a party iduces all or part of a writing or recorded statement, an adverse party		
										nurnose As a result this is hearsay - the County may	require the introduction, at that time, of any other part that in		
										cannot introduce into evidence out of court fairn	less ought to be considered at the same time." Additionally, the		
										statements by the Commission (these testing	mony is not hearsay, and even if somehow found to be so, it would		
										statements are, of course, not "statements of a still to party opponent" under 801(d)(2) when the County at 11	be admissible for purposes of completeness. See Gravely , 840 F.2d		
										itself attempts to introduce them)	163.		
87	13	87	19	n/a		73	9	73	15	n/a n/a			
108	7	108	21	n/a		75	20	76	3	Improper completeness designation - it isn't This	designation completes, explains and/or provides context to the mony designated by Defendants regarding what the County		
										responding directly to anything Defendants testin designated, and FRCP 32(a)(3) only permits an Com	mony designated by Derendants regarding what the County nmission is aware of and/or what it has done regariding the opioid		
										adverse party to use a 30(b)(6) deposition for any prob	plem. See e.a. Dep. at 20:17-21:4: 35:5-13: 85:22-86:6: 87:13-19:		
										purpose. As a result, this is hearsay - the County 133:	:13-134:17. Also, this completeness designation further explains the s of the County Commission's responsibility and/or authority.		
										cannot introduce into evidence out of court limits	s of the County Commission's responsibility and/or authority.		
										statements by the Commission (these Purs	suant to FRE 106, "[i]f a party introduces all or part of a writing or		
										statements are, of course, not "statements of a reco	orded statement, an adverse party may require the introduction, at that		
										itself attempts to introduce them).	, of any other part that in fairness ought to be considered at the le time." Additionally, the testimony is not hearsay, and even if		
										some	ehow found to be so, it would still be admissible for purposes of		
										comp	pleteness. See Gravely, 840 F.2d at 1163.		
109	5	109	11	n/a		76	5	76	11	Improper completeness designation - it isn't Sam	ne response as above.		
										responding directly to anything Defendants	·		
										designated, and FRCP 32(a)(3) only permits an			
										adverse party to use a 30(b)(6) deposition for any purpose. As a result, this is hearsay - the County			
		1								cannot introduce into evidence out of court			
		1								statements by the Commission (these			
		1								statements are, of course, not "statements of a			
		1								party opponent" under 801(d)(2) when the County			
109	22	110	8	Relevance	This is relevant testimony. Cabell County publicly filed a Complaint	82	18	82	22	n/a n/a			
1		1			against Distributors alleging that Distributors were a cause of the opioid								
		1			epidemic. Defendants are entitled to probe the Commission's designee to								
		1			ask about other alleged causes that the Commission was aware of, and in light of Plaintiffs' request for more than \$2 billion to "abate" the crisisit								
	1	1			is also appropriate to ask what steps the Commission has taken to								
					address these alleged causes. The 30b6 witness is itself the representative of the Cabell County								
113	11	113	20	Calls for Expert Opinion; Calls for a	The 30b6 witness is itself the representative of the Cabell County	84	22	85	21	n/a n/a			
	1	1		Legal Conclusion; Speculation	Commission. It is not "speculative" to ask the Cabell County Commission whether the Commission was aware of any causes of the opioid								
	1	1			whether the Commission was aware or any causes of the opioid epidemic. It is also not seeking a legal or expert opinion: prior to retaining								
	1	1			any expert witnesses in this case, Cabell County publicly filed a								
		1			Complaint against Distributors alleging that Distributors were a cause of								
		1			the opioid epidemic. Defendants are entitled to probe the Commission's								
L	<u></u>	<u></u>			designee to ask about other alleged causes that the Commission was								
115	8	115	13	Calls for Expert Opinion; Calls for a	The 30b6 witness is itself the representative of the Cabell County	86	7	86	21	n/a n/a			
		1		Legal Conclusion; Speculation	Commission. It is not "speculative" to ask the Cabell County Commission								
		1			whether the Commission was aware of any causes of the opioid epidemic. It is also not seeking a legal or expert opinion: prior to retaining								
		1			any expert witnesses in this case, Cabell County publicly filed a								
	1	1			Complaint against Distributors alleging that Distributors were a cause of								
	1	1			the opioid epidemic. Defendants are entitled to probe the Commission's								
		1			designee to ask about other alleged causes that the Commission was aware of (e.g., prescribing physicians who decide what medications may								
		1			aware or (e.g., prescribing physicians who decide what medications may be appropriate for a particular patient).								
L		1	1										
115	18	115	24	Speculation	Counsel did not object to this question at the deposition, so the objection	92	1	92	7	n/a n/a			
	1	1			is waived. Moreover, it is not speculative to ask the designee for the Cabell County Commission about the Commission's knowledge. If the								
	1	1			witness didn't know the answer, she was free to testify as such.								
					, , , , , , , , , , , , , , , , , , , ,								

AMPIERCE-16606336 v1

Case 3:17-cv-01362 Document 1501-14 Filed 10/04/21 Page 4 of 7 PageID #: 67979

WITNESS N	AME:		Beth Thompson - Cabell County 30(b)(6)			-								
DEPOSITIO	N DATE:		July 23, 2020 and July 28, 2020	_										
			DEFNDANT AFFIDMATIVE	DEPOSITION DESIGNATIONS					PLAINTIFF COUNTER DESIGNATIONS *Pink = Completeness Designation DEFENDANT REPLY DESIGNATIONS *Pink = Completeness Designation					
133 13	1	134	17 Calls for Expert Opinion	This does not are sleeking more than \$20 libro to "shafe" the opioid epidemic, claiming that such money is "necessary." The designee of the Commission can testify about the functions of Cabelli County and what steps Cabelli County has taken. The witness was free to testify that she did not know the answer, if that had been the case.	96	18	97	4	Improper completeness designation - it isn't responding directly to anything Defendants and one report of the production					
135 20	1	136	17 Relevance; Speculation; Vague	It is not remotely speculative to ask the Cabel County Commission's designee whether the Commission has the ability to apply for grants, and whether it has done so in the past. Cabell County (along with Hunfrighen) are seeking more than \$2 billion to "bather the oppole deplemer, claiming are seeking more than \$2 billion to "bather the oppole deplemer, claiming testify about the functions of Cabell County and what steps Cabell County has taken. The wintees was free to testify that she did not know the answer, if that had been the case. This is clearly relevant testimony and goes to undermine Cabell's claim that it requires more than \$2 billion to the goes to undermine Cabell's claim that it requires more than \$2 billion to the than \$2 billion to the state of the case.	97	9	97	13	Improper completeness designation - it isn't Same response as above. responding directly to anything Defendants designated. As a result, this is hearrary - the County cannot instructive this evidence out of statements are, of course, not "statements of a party opponent" under 8014((2) when the County itself attempts to introduce them).					
137 8	1	137	10 Relevance; Vague	Cabell Courty (along with Hurtington) are seeking more than \$2 billion to "abate" the option depteimer, claiming that such money is *necessary." The designee of the Commission can testify about the functions of Cabell County and what steps Cabell County has taken. The witness was free to testify that she did not know the answer, if that had been the case. This is clearly relevant testimony and goes to undernine Cabell's claim that it requires more than \$2 billion to "abate" this crisis.	99	11	99	14	n/a n/a					
143 14 145 15	1	144	24 n/a		100	3	100	9	IVA IVA					
152 20	1	145 153	18 n/a n/a Speculation; Lack of Personal Knowledge; Lack of Foundation; Ca for a Legal Conclusion	The 30bB witness is itself the representative of the Cabell County list Commission. It is not "speculative" to ask the Cabell County Commission expectation of the Cabell County Commission expects with the Cabell County Commission expects witnesses in this case, Cabell County publicly filed a Complaint against Distributions alloging that Distributions were a cause of the opioid epidemic. Defendants are entitled to probe the Commission's designee to sake about other alleged causes that the Commission's aware of (e.g., DEA). If the witness (the Commission) didn't know the amove, the witness was fee to say the commission was aware of (e.g., DEA).	108	22	109	4						
166 13	1	166	20 Na		112	15	112	20	Improper completeness designation - it isn't responding directly to anything Defendants regarding improved and the control of					
168 8	1	168	18 n/a		113	5	113	10	Improper completeness designation - it isn't some designation - it isn't seponding directly to anything Defendants designated, and FRCP 32(a)(c) only permits an adverse party to use a 50(b)(6) deposition for any purpose. As a result, this is hearsy, "the County carnor introduce in the evidence out of court statements by the Commission (them the County of the Count					
169 10		170	10 n/a		115	14	115	17	n/a n/a					
170 19 172 15		171 172	11 n/a 23 Argumentative; Calls for a Legal Conclusion 11 (177:6-11) Compound; Vague;	This questioning is not argumentative, and even if it was, counsel did not object to the questioning at the deposition so the objection is waived. It does not call for a legal conclusion to ask the Commission whether it was aware of an opicid problem in the ommunity as of 2006- that is a question of fact. The question identified at 177:6-11 is not compound, and the witness did	116	21	116	17	n/a					
110 13	1		Speculation	not indicate any difficulty in understanding or answering the question Additionally, coursel at the deposition off not object, whiring this possible objection now. And it is not speculative to sak the designee of the objection now. And it is not speculative to sak the designee of the specific product of the commission's knowledge - that is the purpose of 3066 testimony.	124	3	120		responding directly to anything Defendants designated, and RFPOR 22(a)(3) only permits an ordered party to use a 30(b)(b)(d) deposition for any and/or causes of same. See e.g., Dep. at 60.3-16, 65.1-66, 52.15-14, and the same of the s					
177 19		178	2 Speculation; Vague	Thhe witness did not indicate any difficulty in understanding or answering the question. Additionally, course lat the deposition did not beject, waining this possible objection now. And it is not speculative to ask the designee of the Commission about the Commissions conduct or knowledge - that is the purpose of 30b6 testimony.	126	15	127	15	Improper completeness designation - it isn't Same response as above. responding directly to anything Defendants designated, and FRCP 92(a)(3) only permits an adverse party to use a 30(b)(6) despotation for any purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these intervents by the Commission (these statements by the Commission (the					
178 4	1	178	11 (178:4) Speculation; Vague	Thhe witness did not indicate any difficulty in understanding or answering the question. Additionally, coursel as the deposition did not object, waiving this possible objection now. And it is not speculative to ask the designee of the Commission about the Commission school and Commission about the Commission school and knowledge - that is the purpose of 30b6 testimony.	127	21	129	9	Improper completeness designation - it isn't responding directly to anything Defendants and one provides context to the responding directly to anything Defendants and one provides context to the responding directly to anything Defendants regarding option-fleated costs harms in Cabell adverse party to use a 30(b)(6) deposition for any (Commission is aware of regarding option-fleated costs harms in Cabell adverse party use a 50(b)(6) deposition for any (Commission is aware of regarding option-fleated costs harms in Cabell adverse and the second of the second					

AEFOLIN-160078514 v1

WITNESS NAME: Beth Thompson - Cabell County 30(b)/(6) DEPOSITION DATE: July 23, 2020 and July 28, 2020																
DEPOSITION DATE: July 23, 2020 and July 28, 2020 DEPODANT AFFIRMATIVE DEPOSITION DESIGNATIONS																
184	20	188	10	DFENDANT AFFIRMATIVE D	REPOSITION DESIGNATIONS	132	16	132	22	PLAINTER COUNTER DESIGNATIONS Improper completeness designation It sin't responding directly to anything Defendants designated, and RFCP 32(a)(a) only permits an adverse party to use a 30(b)(6) deposition for any purpose. As a result, this is hearsay, the County cannot introduce into evidence out of court statements by the Commission (these of as the commission (them out of the commission) them only anytopendant counter 501(a)(a) when the County statements by the other statements are, of course, not "statements by the his County statements of anytopendant" course 501(a)(a) when the County statements of the county opendant vince 501(d)(a) when the County statements are, of course, our statements by the new forces of the county opendant vince 501(d)(a) when the County opendant vince 501(d) when the County opendant vince 501(d)(a) when the Count	Same response as above.		DEFENDANT REPLY DESIGNATIONS *Pink = Completeness Designation			
189	3	194	13	n/a		133	8	133	12	Improper Completeness designation - it sin't responding directly to anything Defendants designated, and RFOP 32(a)(3) only permits an adverse party to use a 30(b)(6) deposition for any purpose. As a result, this is hearing, the County outpose As a result, this is hearing, the County carnot introduce into evidence out of court statements by the Commission (these Commission) (these County of Statements of a county of Statements of a county of Statements of a county of Statements of the County of Statements of Stateme	Same response as above.					
264	17	265	6	Speculation; Calls for a Legal Conclusion; Relevance	It is not speculative to ask the Commission's designee about grants that divisions of county government have applied for . If the witness didn't know the answer, she was free to say so. It also does not call for a legal conclusion to ask the Commission about the purpose of various grants that county government has applied to. This testimony is relevant that county government has applied to. This testimony is relevant to 'abable' the opioid crisis - whether the County exercised reasonable steps to apply for external funding like grants) is relevant to whether this newfound claim for \$2billion is actually necessary. Additionally, this grant application discusses of the possible causes of the opioid epidemic, which is highly relevant. Additionally, counsel did not object at the deposition, washing this objection.	134	18	134	24	n/a	nha					
266		267	10	Relevance	This grant application describes other possible causes of the opioid epidemic - whether the Commission agrees that those are possible causes is highly relevant. Additionally, counsel did not object at the deposition, waiving this objection. This grant application describes other possible causes of the opioid	135	3	135	19	n/a	n/a					
270		209	20		I'ms grant application describes often possible causes of the option epidemic - whether the Commission agrees that those are possible causes is highly relevant. Additionally, counsel did not object at the deposition, waiving this objection. This grant application describes other possible causes of the opioid	137	4	137	,	IIVa	INA					
	-	272	20	Relevance	epidemic - whether the Commission agrees that those are possible causes is highly relevant. Additionally, counsel did not object at the	139	4	139	20	n/a	n/a					
274	23	278	11	Relevance	desosition. waiving this objection. This grant application describes other possible causes of the opioid epidemic - whether the Commission agrees that those are possible causes is highly relevant. Additionally, counsel did not object at the deposition, waiving this objection.	143	4	143	13	n/a	n/a					
279	11	280	3	Relevance	This grant application describes other possible causes of the opioid pidemic - whether the Commission agrees that those are possible causes is highly relevant. Additionally, coursed idin not object at the decogation, waiving this oblection. This grant application describes other possible causes of the opioid	145	1	145	14	n/a	n/a					
	24	283	9	Relevance	epidemic - whether the Commission agrees that those are possible causes is highly relevant. Additionally, counsel did not object at the deposition, waiving this objection.	145	19	146	2	purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these statements are, of course, not "statements of a party opponent" under 801(d)(2) when the County itself attempts to introduce them).	This designation completes, explains and/or provides context to the sestimony designate by Defendants regarding what the Could County Commission is aware of regarding opioid-related harms in Cabell County and/or causes of same. See a.g., Dep a 261 174.124, 60.314, 665.14665, 83.65-41, 108.721, 153.2-5. Pursuant to FRE 106, [1//] a party introduces all or part of a writing or recorded statement, an adverse party many require the introduction, at that time, of any other part					
284	1	284	20	Relevance	This grant application describes other possible causes of the opioid epidemic - whether the Commission agrees that those are possible causes is highly relevant. Additionally, counsel did not object at the deposition, waiving this objection.	146	9	147	18	Improper completeness designation - it in 'i' responding directly to anything Defendants designated, and FRCP 32(a)(3) only permits an adverse party to use a 30(b)(6) deposition for any purpose. As a result, this is hearsay - the Courty cannot inroduce into evidence out of court statements by the Commission (these statements are, of course, not "statements are, of course, not "st	Same response as above.					
284		285	11	Relevance	This grant application describes other possible causes of the opicid epidemic - whether the Commission agrees that those are possible causes is highly relevant. Additionally, counsel did not object at the deposition, waiving this objection.	149	9	151	1	Island affatements in introduce them) improper completeness designation - it len't responding directly be surjiveling Defendants designated, and FRCP 25(s)(s) rely permits an adverse party to use a 5(b)(s)) deposition for any control introduces into evidence out of court statements by the Commission (these statements by Course, not "statements of a party opponent" under 801(s)(s) when the County islated attacked is controluced them.	Same response as above.					
290	14	291	3	Speculation; Calls for Expert Opinior	This grant application describes other possible causes of the opioid epidemic-whether the Commission agrees that those are possible causes is highly relevant. Additionally, counsel did not object at the deposition, waiving this objection.	151	16	152	15	Improper completeness designation - it isn't responding directly to anything Defendants designated, and FRCP 32(a)(3) only permits an adverse party to use a 30(b)(6) deposition for any purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these statements are, of course, not's statements of a	This designation completes, explains and/or provides context to the leastmony designated by Defendants regarding what the Country Commission has done to ablate the opioid problems, grants assupt regarding the opioid problems, and or the Country 152 of 100 of					
302	20	305	16	Speculation; Lack of Foundation; Assumes Facts	Coursel did not object to any of these questions at the deposition, nor does coursel today point to any questions that assume facts not in evidence, lack foundation, or are speculative. It is not speculative to ask the Commission's designee about the Commission's knowledge of factors surrounding the opicid epidemic. The witness was free to testify that the Commission did not know, if that was the answer.	168	19	169	9	n/a	nla					
307	13	307	19	Relevance	This is highly relevant testimony. Plaintiffs are seeking more than \$2 ultilion to "batch" the epidemic, sleding that such money is "necessary." The fact that the County has freed up money and has a rainy day fund, ye has chosen not to use it on opioid-releted programming undermines Plaintiffs' claims that the \$2 billion in its "abatement" plan is truly necessary.	171	12	171	18	na/	n/a					
309	2	310	8	Relevance	This is highly relevant testimony. Plaintiffs are seeking more than \$2 \text{.} This is highly relevant testimony. Plaintiffs are seeking more than \$2 \text{.} billion to "abate" the epidemic, alteging that such money is "necessary aring day fund, yet has chosen not to use it on opioid-related programming undermines "Plaintiffs" claims that the \$2 billion in its "abatement" plan is truly necessary.	171	24	172	14	n/a	n/a					

AMPIERCE-1005083

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	WITNESS NAME: Beth Thompson - Cabell County 30(b)(6) DEPOSITION DATE: July 23, 2020 and July 28, 2020															
			DEFNDANT AFFIRMATIVE DE	DEPOSITION DESIGNATIONS					PLAINTIFF COUNTER DESIGNATIONS *Pink = Co	mnleteness Designation	_			DEFENDANT REPLY DESIGNATIONS *Pink = Completeness Designation		
312 8	312	16	n/a		173	4	174	12	n/a	n/a				DELITORITY NEL ET DESIGNATIONS TIME - Completeness designation		
313 9	313	24	Speculation; Relevance; Calls for Legal Conclusion; Calls for Expert Opinion	This is highly relevant testimony. Prior to engaging any expert witnesses in this case, Plaintiff Cabell County filed a Complaint alleging various causes of the opioid epidemic. It is highly nelevant to ask the Commission's designee about other possible causes of the opioid epidemic. And it is not speculative for the Commission's designee to testify about the Commission's knowledge or belief - that is the purpose of 3RMs testimony.	174	16	175	12	n/a	n/a						
314 4	315	4	Speculation; Calls for Legal Conclusion; Calls for Expert Opinion	This is highly relevant teatmony. Prior to engaging any expert witnesses in this case, Planiff Cabell County filed a Complaint alleging various causes of the opioid epidemic. It is highly relevant to ask the Commission's designee about other possible causes of the opioid epidemic. And it is not speculative for the Commission's designee to the commission's designee to the commission's thorowide gor belief—that is the purpose of	175	14	175	22	n/a	n/a						
315 23	317	23	Speculation; Calls for Legal Conclusion; Calls for Expert Opinion	This is highly relevant testimony. Prior to engaging any expert witnesses in this case, Plaintiff Cabell County filed a Complaint alleging various causes of the opioid epidemic. It is highly relevant to ask the Commission's designee about other possible causes of the opioid epidemic. And it is not speculative for the Commission's designee to testify about the Commission's knowledge or belief - that is the purpose of 3fb6t settimony.	178	12	178	18	n/a	n/a						
319 18	319	21	Speculation; Lack of Foundation; Lack of Knowledge	It is not speculative to ask the Commission's designee about the Commission's knowledge - that is the purpose of 30b6 testimony, and the witness was free to respond that she did not know the answer.	179	16	180	18	n/a	n/a						
337 12	337	20	n/a		183	5	183	23	n/a	n/a						
346 8	348	3	Relevance	The fact that the Commission has never considered limiting the dispensing of policies undermines Planiffs claims that the distribution of opioids (by Distribution) is unreasonable. Additionally, the fact that the County's health insurance program owers prescription opioids and the County heaver discussed the possibility of limiting payment for opioid prescriptions demonstrates that the County believes opioids can be appropriate medical treatments, undermining Planiffs' claim that Distribution's distributions of prescription opioids was unreasonable.	184	4	184	19	n/a	nota						
366 8	368	22		The witness did not indicate that any of these questions were vague, nor did coursel at the deposition object. It is not speculative to ask the Commission's designee about its knowledge of various County programs—that is the purpose of 3066 testimony, if the witness did not know, she was free to say so. It does not call for an expert opinion to ask the was free to say so. It does not call for an expert opinion to ask the was the commission believes they are effective.	200	13	201	19	purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these statements are, of course, not "statements of a party opponent" under 801(d)(2) when the County itself attempts to introduce them).	See e.g., Dep. at 133:13-134:17; 136:7-17; 148:20-188:10; 1893-194:13 132:8-16; 405:221. Pursuant to FFE (10. § [fip a part) introduces all or part of a writing or recorded statement, an adverse party may require the introduction, at that time, of any other part						
3/1 12	3/2	12	renevative, vague, speculation, Laux of Foundation	The witness did not indicate that any of these questions were vague, nor did coursel at the deposition object. It is not speculative to ask the Commission's designee about its knowledge of various County programs—that is the purpose of 306t featimony, if the witness did not know, she was free to say so. It does not call for an expert opinion to ask the was free to say so. It does not call for an expert opinion to ask the and whether the Commission's designee about how various county prorrais operate and whether the Commission believes they are effective. This is hightly relevant testimony: the Planistifs claim that they require more than \$2.5 billion to "abate" the opioid epidemic. But if the CabellHuntington community already has resources in place that are effectively addressing the opioid epidemic. Planistifs have not met their burden to demonstrate that their proposed "abatement" [has in encessary.	202	9	203	24	improper completeness designation - it lan't responding indexity to anything Defendants designated, and FRCP \$2(a)(3) only permits an adverse party to use a \$0(b)(6) (adposition for any purpose. As a result, this is hearsay - the County cannot introduce thin evidence out of court statements by the Commission (these statements by the Courty in the County is attained to party opponent" under 801(d)(2) when the County (tateff attempts to introduce them).	Same response as above.						
401 18	402	6	n/a		204	14	204	19	Improper completeness designation - It isn't responding directly to anything Defendants designated, and FRCP 32(a)(3) only permits an adverse party to use a 30(b)(6) deposition for any purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these statements are, of course, not "statements of a party opponent" under 801(a)(2) when the County	Same response as above.						
404 1	404	18	Relevance	This is highly relevant testimony. Plaintiffs are seeking more than \$2 billion to "bable" the epidemic, alleging that such money is "necessary." The fact that the County has unused carryover funds of several million dollars—that haven't been used to address the opicid epidemic—weakens Plaintiffs' claims that money for its "abatement" plan is necessary.	267	11	268	6	n/a	n/a						
405 2	405	21	Relevance	This is highly relevant testimony. Plaintiffs are seeking more than \$2 billion to "bable" the epidemic, aleign that such money is "necessary." The fact that the County has unused carryover funds of several million dollars—that haven't been used to address the policid epidemic—weakens Plaintiffs' claims that money for its "abatement" plan is necessary.	269	21	270	11	n/a	n/a						
	-	1			278 278	12	278 278	14	n/a n/a	n/a n/a						
					283	10	283	24	n/a	n/a						
\vdash	_	-			289 290	12	289 290	13	n/a n/a	n/a n/a						
					311	4	311	21	n/a	n/a						
					332	3	322	8	purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these statements are. of course, not "statements of a	This designation completes, explains and/or provides context to the testinationy designated by Defendants regarding what the Contection Control Contro						
					350	17	351	18	Improper completeness designation - it isn't	As an initial matter, this testimony can be considered as completeness as it addresses the County Commission's authority/responsibility, and/or	S					
									responding directly to anything Defendants designated, and FRCP 32(a)(3) only permits an adverse party to use a 30(b)(6) deposition for any purpose. As a result, this is heartsay - the County cannot introduce into evidence out of court statements by the Commission (these statements are, of course, not "statements of a party opponent" under 801(d)(2) when the County tend of the process of the county period of the process of the county tend of the process of	employees or benefit programs, which are topics put at issue by numerous designations made by defendants regarding what the County	1					

AEFOLIN-160078514 v1

Case 3:17-cv-01362 Document 1501-14 Filed 10/04/21 Page 7 of 7 PageID #: 67982

WITNESS NAME: Beth Thompson - Cabell County 30(b)(6) DEPOSITION DATE: July 23, 2020 and July 28, 2020	SEPOSITION DATE: July 23, 2020 and July 28, 2020													
DFENDANT AFFIRMAT	/E DEPOSITION DESIGNATIONS				PLAINTIFF COUNTER DESIGNATIONS *Pink = Completeness Designation	DEFENDANT REPLY DESIGNATIONS *Pink = Completeness Designation								
	352	16	353		Improper completeness designation - it isn't responding directly to anything Definednets designated, and FRCP '20(a)(3) only premits an adverse party to use a 30(b)(6) deposition for any purpose. As a result, this is hearsay - the County cannot introduce into evidence out of county cannot introduce into evidence out of county catalements by the Commission (these statements by the Commission (these statements are of course, not 'statements of a party opponent' under 801(d)(2) when the County									
	994	10	395		improper completeness designation - It sin't responding directly to anything Defendants before directly to a 20(b)(c) expending of the PEP Program'. See Dep. at 37:11:2-17. adverse party to see a 30(b)(c) expending for any Prusants to FEE 106, "If I party introduces all party introduces all party introduces and party introduces and party introduces and seatements of a party opponent" under 801(d)(c) when the County completeness are demanded to the control of the County control									
	395	9	396		Improper completeness designation - it isn't responding directly to anything Defendants designated, and FRCP 32(a)(3) only premits an adverse party to use a 30(b)(6) desposition for any purpose. As a result, this is hearsay - the County cannot introduce into evidence out of court statements by the Commission (these statements by the Commission) these statements are, of course, not "statements of a party opponent" under 801(a)(2) when the County isned attained to include a statement and the courts of the statements of a party opponent" under 801(a)(2) when the County isned attained to include a statement and the statements are considered as the statement and the statement are considered as the statement and the statement are considered as the statement and the statement are considered as the statement and the statement are considered as the statement and the statement are considered as the statement are considered as the statement and the statement are considered as the statement are considered as the statement and the statement are considered as the st									

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